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2 Nevada Bar No. 14635  
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**TROUTMAN PEPPER HAMILTON SANDERS LLP**  
6 600 Peachtree St. NE #3000  
7 Atlanta, GA 30308 (*Corporate Office*)

8  
*Attorneys for Defendant Nationstar  
Mortgage LLC, dba Mr. Cooper and Federal  
National Mortgage Association*

9  
10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 SFR INVESTMENTS POOL 1, LLC,

13 Plaintiff,

14 vs.

15 NATIONSTAR MORTGAGE, LLC d/b/a  
16 MR. COOPER; FEDERAL NATIONAL  
17 MORTGAGE ASSOCIATION; DOES I  
18 through X; and ROE BUSINESS ENTITIES  
19 I through X, inclusive,

20 Defendants.

21 Case No. 2:22-cv-00534-GMN-NJK

22 **STIPULATION AND ORDER TO EXTEND  
DEADLINES**

23 **(SECOND REQUEST)**

24 Plaintiff, SFR Investments Pool 1, LLC (“SFR”) and Defendants, Nationstar Mortgage, LLC d/b/a  
25 Mr. Cooper (“Nationstar”) and Federal National Mortgage Association (“Fannie Mae”) (collectively, the  
26 “Parties”), by and through their undersigned counsel, hereby stipulate and agree to extend the date for  
27 Nationstar and Fannie Mae to file a response to SFR’s Complaint [ECF No. 1]. The Parties further stipulate  
and agree that the foreclosure sale on the subject property be postponed until this Court rules on SFR’s  
Emergency Motion for Temporary Restraining Order and Preliminary Injunction (“Motion”) [ECF No.’s  
7, 8]. In support of the stipulation, the Parties state as follows:

1. On March 28, 2022, SFR Investments Pool 1, LLC (“SFR”) filed the Complaint in the  
2 instant matter. [ECF No 1].
3. On March 30, 2022, SFR filed an Emergency Motion for Temporary Restraining Order  
4 and Preliminary Injunction (“Motion”). [ECF No. 7, 8].
5. On April 1, 2022, this Court entered a minute order in chambers setting a deadline for  
6 Defendants to respond to the Motion no later than Monday, April 4, 2022 at 5:00 p.m. and  
7 further ordering an in person hearing on the Motion for Tuesday, April 5, 2022, at 3:00  
8 p.m. [ECF No. 8].
9. On April 4, 2022, this Court entered an order extending the deadline for Defendants to  
10 respond to the motion for preliminary injunction to April 13, 2022 and setting the deadline  
11 for SFR to file a reply in support of its motion for April 20, 2022. [ECF No. 12].
12. On April 15, 2022, this Court entered an order extending the deadline for Defendants to  
13 respond to the motion for preliminary injunction and file a responsive pleading to SFR’s  
14 Complaint to May 4, 2022. The Order further allowed the Motion to be briefed in the  
15 normal course pursuant to LR 7-2. [ECF No. 14].
16. On June 7, 2022, this Court entered an order extending the deadline for Defendants to  
17 respond to the motion for preliminary injunction and file a responsive pleading to SFR’s  
18 Complaint to June 24, 2022. The Order further declared that SFR shall have seven days  
19 after service of Defendants’ Response to file a reply in support of its Motion. [ECF No.  
20 16].
21. Defendants filed its Opposition to the Motion for Preliminary Injunction on June 24, 2022.  
22 [ECF No. 17].
23. On June 29, 2022, this Court entered an order extending the deadline for Defendants to file  
24 a responsive pleading to SFR’s Complaint to July 22, 2022. [ECF No. 19]
25. SFR filed its Reply in Support of its Motion for Preliminary Injunction on July 7, 2022.  
26 [ECF No. 20].
27. Defendants agree to refrain from setting the foreclosure sale of the real property located at  
28

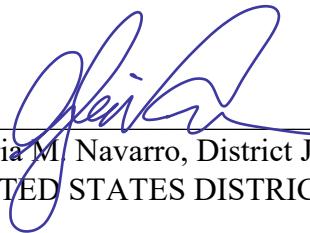
1           **6171 Fox Creek, Las Vegas, NV 89122, Parcel No. 161-15-212-175** until such time as  
2           this Court rules on the Motion. The Motion is now fully briefed.

- 3       11. Finally, the Parties agree that Defendants shall have until August 19, 2022, to file a  
4           response to SFR's Complaint.  
5       12. Both parties represent this stipulation is not made with any intent to delay or prejudice  
6           either party.

DATED this 25 <sup>th</sup> day of July, 2022.  <b>TROUTMAN PEPPER HAMILTON SANDERS LLP</b>	DATED this 25 <sup>th</sup> day of July, 2022.  <b>HANKS LAW GROUP</b>
/s/ <i>Vanessa M. Turley</i> _____ Vanessa M. Turley, Esq. Nevada Bar No. 14635 8985 S. Eastern Avenue, Suite 200 Las Vegas, NV 89123  <i>Counsel for Nationstar Mortgage, LLC</i> <i>dba Mr. Cooper and Federal National</i> <i>Mortgage Association</i>	/s/ <i>Chantel M. Schimming</i> _____ Chantel M. Schimming, Esq. Nevada Bar No. 8886 7625 Dean Martin Drive, Suite 110 Las Vegas, NV 89139  <i>Counsel for SFR Investments Pool 1, LLC</i>

16  
17           **IT IS SO ORDERED.**

18           Dated this 28 day of July, 2022.

19  
20  
21  
22             
Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT

**Duarte, Evelyn S.**

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**From:** Turley, Vanessa M.  
**Sent:** Tuesday, July 26, 2022 3:18 PM  
**To:** Duarte, Evelyn S.  
**Subject:** FW: Paguia / 6171 Fox Creek -SAO to extend deadline to file Responsive Pleading to Complaint [Second Request]  
**Attachments:** SAO to Extend Response Deadlines Paguia\_ 6171 Fox Creek 2nd Request (SFR edits).docx

**Vanessa M. Turley**

Attorney

**troutman pepper**

Direct: 470.832.5572

vanessa.turley@troutman.com

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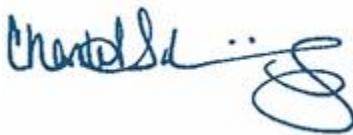
**From:** Chantel Schimming <chantel@hankslg.com>  
**Sent:** Friday, July 22, 2022 5:50 PM  
**To:** Turley, Vanessa M. <Vanessa.Turley@troutman.com>; Karen Hanks <karen@hankslg.com>  
**Cc:** STAFF HANKSLG <staff@hankslg.com>; Balser, Justin D. <Justin.Balser@troutman.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>; Llarena, Carla D. <Carla.Llarena@troutman.com>  
**Subject:** RE: Paguia / 6171 Fox Creek -SAO to extend deadline to file Responsive Pleading to Complaint [Second Request]

**EXTERNAL SENDER**

See attached a redlined copy of the SAO. I made a few edits. I believe the MTRO/PI has been fully briefed and the SAO is just for an extension of the responsive pleading deadline, correct? Also, I added Fannie Mae as a party you represent and as a party in parts of the body where Fannie Mae was left out.

With these redlined changes, you can file with my e-signature.

Thanks,  
Chantel



Chantel M. Schimming, Esq.  
Associate Attorney

**HANKS LAW GROUP**

7625 Dean Martin Drive, Suite 110  
Las Vegas, Nevada 89139

Telephone: (702) 758-8434  
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**From:** Turley, Vanessa M. <[Vanessa.Turley@troutman.com](mailto:Vanessa.Turley@troutman.com)>  
**Sent:** Friday, July 22, 2022 2:14 PM  
**To:** Karen Hanks <[karen@hankslg.com](mailto:karen@hankslg.com)>; Chantel Schimming <[chantel@hankslg.com](mailto:chantel@hankslg.com)>  
**Cc:** STAFF HANKSLG <[staff@hankslg.com](mailto:staff@hankslg.com)>; Balser, Justin D. <[Justin.Balser@troutman.com](mailto:Justin.Balser@troutman.com)>; Streible, Elizabeth M. <[Elizabeth.Streible@troutman.com](mailto:Elizabeth.Streible@troutman.com)>; Llarena, Carla D. <[Carla.Llarena@troutman.com](mailto:Carla.Llarena@troutman.com)>  
**Subject:** RE: Paguia / 6171 Fox Creek -SAO to extend deadline to file Responsive Pleading to Complaint [Second Request]

Hi Karen and Chantel,

Attached is the stipulation and order. Please let me know if I may submit with your e-signature.

Thanks and have a good weekend!

**Vanessa M. Turley**  
Attorney  
**troutman pepper**  
Direct: 470.832.5572  
[vanessa.turley@troutman.com](mailto:vanessa.turley@troutman.com)

---

**From:** Karen Hanks <[karen@hankslg.com](mailto:karen@hankslg.com)>  
**Sent:** Thursday, July 21, 2022 1:17 PM  
**To:** Turley, Vanessa M. <[Vanessa.Turley@troutman.com](mailto:Vanessa.Turley@troutman.com)>; Chantel Schimming <[chantel@hankslg.com](mailto:chantel@hankslg.com)>  
**Cc:** STAFF HANKSLG <[staff@hankslg.com](mailto:staff@hankslg.com)>; Balser, Justin D. <[Justin.Balser@troutman.com](mailto:Justin.Balser@troutman.com)>; Streible, Elizabeth M. <[Elizabeth.Streible@troutman.com](mailto:Elizabeth.Streible@troutman.com)>; Llarena, Carla D. <[Carla.Llarena@troutman.com](mailto:Carla.Llarena@troutman.com)>  
**Subject:** RE: Paguia / 6171 Fox Creek - Original Collateral File

#### EXTERNAL SENDER

I have not. Let's stipulate and I'll look at it this week or next.



**Karen L. Hanks, Esq.**  
7625 Dean Martin Drive, Ste 110  
Las Vegas, Nevada 89139  
702-758-8434  
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---

**From:** Turley, Vanessa M. <[Vanessa.Turley@troutman.com](mailto:Vanessa.Turley@troutman.com)>  
**Sent:** Thursday, July 21, 2022 12:53 PM  
**To:** Karen Hanks <[karen@hankslg.com](mailto:karen@hankslg.com)>; Chantel Schimming <[chantel@hankslg.com](mailto:chantel@hankslg.com)>  
**Cc:** STAFF HANKSLG <[staff@hankslg.com](mailto:staff@hankslg.com)>; Balser, Justin D. <[Justin.Balser@troutman.com](mailto:Justin.Balser@troutman.com)>; Streible, Elizabeth M. <[Elizabeth.Streible@troutman.com](mailto:Elizabeth.Streible@troutman.com)>; Llarena, Carla D. <[Carla.Llarena@troutman.com](mailto:Carla.Llarena@troutman.com)>  
**Subject:** RE: Paguia / 6171 Fox Creek - Original Collateral File

Hi Karen,

I was wondering if you were able to look into the below. If not, I can draft and Stip and Order to extend the responsive pleading date.

Thanks,

**Vanessa M. Turley**  
Attorney  
**troutman pepper**  
Direct: 470.832.5572  
[vanessa.turley@troutman.com](mailto:vanessa.turley@troutman.com)

---

**From:** Karen Hanks <[karen@hankslg.com](mailto:karen@hankslg.com)>  
**Sent:** Tuesday, July 19, 2022 9:31 AM  
**To:** Turley, Vanessa M. <[Vanessa.Turley@troutman.com](mailto:Vanessa.Turley@troutman.com)>; Chantel Schimming <[chantel@hankslg.com](mailto:chantel@hankslg.com)>  
**Cc:** STAFF HANKSLG <[staff@hankslg.com](mailto:staff@hankslg.com)>; Balser, Justin D. <[Justin.Balser@troutman.com](mailto:Justin.Balser@troutman.com)>; Streible, Elizabeth M. <[Elizabeth.Streible@troutman.com](mailto:Elizabeth.Streible@troutman.com)>; Llarena, Carla D. <[Carla.Llarena@troutman.com](mailto:Carla.Llarena@troutman.com)>  
**Subject:** RE: Paguia / 6171 Fox Creek - Original Collateral File

#### EXTERNAL SENDER

Let me look into it. Might not be until a little later today though. Either way, if need be we can extend the responsive pleading date again.



**Karen L. Hanks, Esq.**  
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---

**From:** Turley, Vanessa M. <[Vanessa.Turley@troutman.com](mailto:Vanessa.Turley@troutman.com)>  
**Sent:** Tuesday, July 19, 2022 8:48 AM  
**To:** Karen Hanks <[karen@hankslg.com](mailto:karen@hankslg.com)>; Chantel Schimming <[chantel@hankslg.com](mailto:chantel@hankslg.com)>  
**Cc:** STAFF HANKSLG <[staff@hankslg.com](mailto:staff@hankslg.com)>; Balser, Justin D. <[Justin.Balser@troutman.com](mailto:Justin.Balser@troutman.com)>; Streible, Elizabeth M. <[Elizabeth.Streible@troutman.com](mailto:Elizabeth.Streible@troutman.com)>; Llarena, Carla D. <[Carla.Llarena@troutman.com](mailto:Carla.Llarena@troutman.com)>  
**Subject:** RE: Paguia / 6171 Fox Creek - Original Collateral File

Hi Karen,

I just left you a voicemail on this file. Our responsive pleading is due July 22 and we are awaiting a hearing date for the Motion for Preliminary Injunction. The Complaint contains the note-based allegations we discussed over the phone last week.

Do you want to do a Stip and Order to file an Amended Complaint? Let me know or just send it over. Also, happy to discuss at 702-349-7748.

Thank you,

**Vanessa M. Turley**

Attorney

**troutman pepper**

Direct: 470.832.5572

[vanessa.turley@troutman.com](mailto:vanessa.turley@troutman.com)

---

**From:** Karen Hanks <[karen@hankslg.com](mailto:karen@hankslg.com)>

**Sent:** Monday, July 11, 2022 1:38 PM

**To:** Turley, Vanessa M. <[Vanessa.Turley@troutman.com](mailto:Vanessa.Turley@troutman.com)>; Chantel Schimming <[chantel@hankslg.com](mailto:chantel@hankslg.com)>

**Cc:** STAFF HANKSLG <[staff@hankslg.com](mailto:staff@hankslg.com)>; Balser, Justin D. <[Justin.Balser@troutman.com](mailto:Justin.Balser@troutman.com)>; Streible, Elizabeth M. <[Elizabeth.Streible@troutman.com](mailto:Elizabeth.Streible@troutman.com)>; Llarena, Carla D. <[Carla.Llarena@troutman.com](mailto:Carla.Llarena@troutman.com)>

**Subject:** RE: Paguia / 6171 Fox Creek - Original Collateral File

**EXTERNAL SENDER**

Paige,

Not producing the note was just one of the violations of NRS 107.200 and 210. We did not plead a separate claim for failing to produce the note. Even if we had, complying after we file suit wouldn't be grounds to dismiss a claim. We still have the damages that flowed from the failure.

But thanks. I don't know that we need to inspect the original, but if we do, I'll contact McCarthy.



Karen L. Hanks, Esq.

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---

**From:** Turley, Vanessa M. <[Vanessa.Turley@troutman.com](mailto:Vanessa.Turley@troutman.com)>  
**Sent:** Monday, July 11, 2022 12:32 PM  
**To:** Chantel Schimming <[chantel@hankslg.com](mailto:chantel@hankslg.com)>; Karen Hanks <[karen@hankslg.com](mailto:karen@hankslg.com)>  
**Cc:** STAFF HANKSLG <[staff@hankslg.com](mailto:staff@hankslg.com)>; Balser, Justin D. <[Justin.Balser@troutman.com](mailto:Justin.Balser@troutman.com)>; Streible, Elizabeth M. <[Elizabeth.Streible@troutman.com](mailto:Elizabeth.Streible@troutman.com)>; Llarena, Carla D. <[Carla.Llarena@troutman.com](mailto:Carla.Llarena@troutman.com)>  
**Subject:** Paguia / 6171 Fox Creek - Original Collateral File

Hi Chantel & Karen,

We have been notified that the original collateral file for Paguia has been delivered locally to McCarthy Holthus.

I have attached the file for your review. However, if you would like to inspect the original Note at their office, you may make an appointment at McCarthy Holthus.

In light of the same, we would request that you dismiss the claims in the Complaint relating to the Note. We would also entertain any settlement offer your client wishes to provide.

Thank you,

**Vanessa M. Turley**

**Attorney**

Direct: 470.832.5572

[vanessa.turley@troutman.com](mailto:vanessa.turley@troutman.com)

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